

MONTGOMERY McCRACKEN WALKER & RHOADS LLP

(A Limited Liability Partnership Formed in Pennsylvania)

LibertyView, Suite 600

457 Haddonfield Road

Cherry Hill, New Jersey 08002

(856) 488-7700

*Attorneys for Defendants South Jersey Health System, Inc.
and South Jersey Hospital, Inc.*¹

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**IN RE: NEW ENGLAND COMPOUNDING : CIVIL ACTION
PHARMACY, INC. PRODUCTS : MDL No. 1:13-md-02419
LIABILITY LITIGATION :**

Hon. F. Dennis Saylor, IV

This Document Relates To:

Jones v. New England Compounding
Pharmacy, Inc., et al., Civ. No. 13-10409-FDS; :
Ramos v. New England Compounding
Pharmacy, Inc., et al., Civ. No. 13-10410-FDS; :
Rios, et al. v. New England Compounding
Pharmacy, Inc., et al., 13-10411-FDS; :
Rivera, et al. v. New England Compounding
Pharmacy, Inc., et al., Civ. No. 13-10412-FDS; :
Tayvinsky, et al. v. New England Compounding
Pharmacy, Inc., et al., Civ. No. 13-10414-FDS; :
Gould, et al. v. New England Compounding
Pharmacy, Inc., et al., Civ. No. 13-10444-FDS; :
Normand, et al. v. New England Compounding
Pharmacy, Inc., et al., Civ. No. 13-10447-FDS :

**CONSENTED TO MOTION FOR ADMISSION OF
LOUIS R. MOFFA, JR., PRO HAC VICE**

Pursuant to Local Rule 83.5.3, Defendants South Jersey Health System, Inc. and South Jersey Hospital, Inc., by their undersigned attorney, move this Court to admit Louis R. Moffa,

¹ Plaintiffs' Complaints incorrectly identify defendants as "South Jersey Healthcare" and "South Jersey Regional Medical Center."

Jr., of the law firm Montgomery, McCracken, Walker & Rhoads, LLP, *pro hac vice* for purposes of the above-captioned matters, and state:

1. The undersigned is a partner at the law firm of Montgomery, McCracken, Walker & Rhoads, LLP, located at LibertyView, Suite 600, 457 Haddonfield Road, Cherry Hill, New Jersey 08002, and is a member in good standing of the bars of the State of New Jersey, the Commonwealth of Pennsylvania, the State of New York, the United States Supreme Court, the United States Court of Appeals for the Third Circuit, and the United States District Courts for the District of New Jersey, the Eastern District of Pennsylvania, and the Eastern District of Michigan.

2. The undersigned was counsel of record for Defendants South Jersey Health System, Inc. and South Jersey Hospital, Inc. in these actions prior to transfer by the Judicial Panel for Multidistrict litigation and, pursuant to this Court's February 15, 2013 Order, MDL Order No. 1 (Doc. No. 4 in MDL No. 1:13-md-02419), is exempted from the local rule requiring retention of a local attorney and *pro hac vice* admission.²

3. Attorney Louis R. Moffa, Jr., is a partner at the law firm of Montgomery, McCracken, Walker & Rhoads, LLP, located at LibertyView, Suite 600, 457 Haddonfield Road, Cherry Hill, New Jersey 08002, and is a member in good standing of the Bars of the State of New Jersey, the United States District Court for the District of New Jersey, the Commonwealth of Pennsylvania, the United States District Court for the Eastern District of Pennsylvania, the District of Columbia, the United States District Court for the District of Columbia, the United

² Attorney Moffa entered his appearance on behalf of South Jersey Health System, Inc. and South Jersey Hospital, Inc. prior to the transfer order in *Hannah v. New England Compounding Pharmacy, Inc., et al.*, Civ. No. 13-10407-FDS. Pursuant to MDL Order No. 1, Mr. Moffa is exempted from the local rule requiring retention of a local attorney and *pro hac vice* admission in the *Hannah* matter.

States Supreme Court and the Courts of Appeal of the Third, Fourth, Ninth and District of Columbia Circuits. Attorney Moffa has been retained by defendants to represent their interests in these actions.

4. As shown by his Declaration filed herewith: (i) Louis R. Moffa, Jr., is a member in good standing of the Bar in every jurisdiction in which he has been admitted to practice; (ii) there are no disciplinary proceedings pending against him as a member of the Bar in any jurisdiction, and (iii) Mr. Moffa is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. All counsel has consented to this Motion.

6. The required filing fee in the amount of \$100.00 has been paid.

WHEREFORE, Defendants South Jersey Health System, Inc. and South Jersey Hospital, Inc. move for the admission of Attorney Louis R. Moffa, Jr., *pro hac vice*, to appear as co-counsel in the above-referenced matters.

Respectfully submitted,

MONTGOMERY, McCRACKEN, WALKER
& RHOADS LLP

Dated: April 8, 2013

/s/Stephen A. Grossman

Stephen A. Grossman (NJ Bar ID 033681997)

Montgomery, McCracken, Walker
& Rhoads, LLP

LibertyView, Suite 600

457 Haddonfield Road

Cherry Hill, NJ 08002

sgrossman@mmwr.com

(856) 488-7700

(856) 488-7720 (facsimile)

*Attorneys for Defendants
South Jersey Health System, Inc.
and South Jersey Hospital Inc.*

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been filed with the Clerk of the Court on April 8, 2013 using the CM/ECF system which sent notification of this filing to all ECF registered counsel of record via e-mail generated by the Court's ECF system.

/s/Stephen A. Grossman
Stephen A. Grossman